

# EXHIBIT 10

**Garrity, Devin**

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**Subject:** RE: Common Interest // RE: GlobalFoundries v. IBM | Subpoenas

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**From:** Signoracci, Pietro J <psignoracci@paulweiss.com>

**Sent:** Thursday, October 31, 2024 11:39 AM

**To:** Padmanabhan, Krishnan <KPadmanabhan@winston.com>; Rizik, Mark <MRizik@winston.com>; Garrity, Devin <DGarrity@winston.com>

**Cc:** Caravello, Scott <scaravello@paulweiss.com>

**Subject:** Common Interest // RE: GlobalFoundries v. IBM | Subpoenas

Common Interest

KP,

Below is from a 6/25/25 email from Latham raising GF's apex-based objection to the requested deposition of GF's CEO, Tom Caulfield:

Latham will accept service of deposition notices for the individuals in your email. However, we do not agree to Mr. Caufield's deposition. GF did not list Mr. Caufield as part of its initial disclosures, and Mr. Caufield does not possess any unique information relevant to this action where IBM's conduct, and IBM's disclosures to Intel and Rapidus, are the focus of GF's claims. And as you know from the state court action, Mr. Caufield's role in the negotiations of the parties' contracts was focused on review of the operational plan.

Best,  
Pietro

**Pietro Signoracci | Counsel**

**Paul, Weiss, Rifkind, Wharton & Garrison LLP**

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